

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JULIE CHRISLEY, Individually and
as Majority Owner of CHRISLEY
ASSET MANAGEMENT, LLC,

Plaintiff,

v.

MARK BRADDOCK, ALINA CLERIE,
KEY ASSET SOLUTIONS, LLC, and
ARC AUTO BROKERS, LLC,

Defendants.

CIVIL ACTION FILE
NO: 1:12-CV-03524-CAP

KIMBERLY A. CHILDS' AMENDED MOTION FOR SANCTIONS

COMES NOW, Kimberly A. Childs ("Childs"), a former Defendant in the above-styled action and files this, her Amended Motion for Sanctions against Plaintiff Julie Chrisley ("Plaintiff" or "Chrisley") and her attorneys Robert T. Thompson, Jr., H. Kirk Henson, Jefferson Adams, and Thompson Law Group, LLC (collectively referred to as "TLG") pursuant to Federal Rule of Civil Procedure 11(c) for failure to comply with Rule 11(b). Plaintiff and TLG filed frivolous claims against Childs which could not be supported by facts or evidence and which were filed for improper purposes.

In support of this Amended Motion, Childs relies on the following:

1. Memorandum of Law in Support of the Amended Motion for Sanctions filed contemporaneously herewith;
2. Notice of Voluntary Dismissal without Prejudice, attached as “Exhibit 1”;
3. November 8, 2012 Correspondence, attached as “Exhibit 2”;
4. E-mail correspondence dated October 12, 2012, attached as “Exhibit 3”¹;
5. E-mail correspondence dated October 15, 2012 (page 3 of chain), attached as “Exhibit 4”; and
6. Docket Report for Childs v. Suntrust Mortgage, Inc., 1:12-cv-00407, attached as “Exhibit 5”;
7. Affidavit of Crystal D. Filiberto, attached as “Exhibit 6”;
8. Orders in Julie Chrisley, Chrisley Asset Management, LLC v. Mark Braddock and Alina Clerie, Superior Court Fulton County, State of Georgia, CAFN: 2012-CV-21996, attached as “Exhibit 7”;
9. Affidavit of Kimberly A. Childs, attached as “Exhibit 8”;

¹ Exhibit 3 has been partially redacted out of an abundance of caution.

10. Order in Julie Chrisley, Chrisley Asset Management, LLC v. Mark Braddock and Alina Clerie, Superior Court Fulton County, State of Georgia, CAFN: 2012-CV-21996, attached as "Exhibit 9."

WHEREFORE, Childs respectfully request that this Amended Motion be GRANTED and that the Court award attorneys' fees and expenses in favor of Childs pursuant to Federal Rule of Civil Procedure 11(c)(4).

Respectfully submitted this 7th day of August, 2013.

HALL BOOTH SMITH, P.C.

/s/Crystal D. Filiberto

Rush S. Smith, Jr.

Georgia Bar No. 663362

Crystal D. Filiberto

Georgia Bar No. 383451

Counsel for Kimberly Childs

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and
foregoing **KIMBERLY A. CHILDS' AMENDED MOTION FOR**
SANCTIONS upon all parties to this matter via CM/ECF as follows:

Robert T. Thompson, Esquire
H. Kirk Henson
Jefferson Adams
Thompson Law Group, LLC
P.O. Box 53484
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Law Offices of Bob Barr
3101 Towercreek Parkway, Suite 150

Atlanta, Georgia 30324

Atlanta, Georgia 30339

This 7th day of August, 2013.

HALL BOOTH SMITH, P.C.

/s/ Crystal D. Filiberto

Rush S. Smith, Jr.

Georgia Bar No. 663362

Crystal D. Filiberto

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CERTIFICATE OF FONT

This is to certify that the within and foregoing pleading has been prepared
using Times New Roman, 14 point, font which has been approved by the Court in
L.R. 5.1C.

Respectfully submitted, this 7th day of August, 2013.

HALL BOOTH SMITH, P.C.

/s/ Crystal D. Filiberto

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Georgia Bar No. 383451

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